

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
vs.	)	No. 16-3024-01-CR-S-MDH
	)	
SAFYA ROE YASSIN,	)	
	)	
Defendant.	)	

**MOTION FOR CONTINUANCE**

Comes now Defendant, Safya R. Yassin, by counsel, and moves this Court, pursuant to 18 U.S.C. § 3161(h)(8)(A) and (B), to remove this case from the scheduled trial setting of December 4, 2017, and to continue this case until the March 26, 2018, Joint Criminal Trial Docket.

**SUGGESTIONS IN SUPPORT**

1. Defendant was charged in a three-count Superseding Indictment on July 19, 2016. Defendant appeared before the Honorable David P. Rush, United States Magistrate, in Springfield, Missouri. Judge Rush appointed the Federal Public Defender's Office for the Western District of Missouri to represent Defendant on February 16, 2016.
2. Additional time is necessary for Defendant to investigate the discovery that has been provided by the government and to complete ongoing negotiations.

3. This continuance is not sought for purpose of dilatory delay, but is sought in truth and fact so that the Defendant may be afforded due process of law under the Fifth Amendment to the United States Constitution. In accordance with 18 U.S.C. § 3161(h)(8)(A) and (B)(iv), it is submitted that a continuance outweighs the best interests of the public and the Defendant to a speedy trial, which is required by 18 U.S.C. § 3161(c)(1).

4. Under the provisions of 18 U.S.C. § 3161(h)(8)(A), the period of time until the requested criminal trial docket setting should be excluded in computing the period of time in which the Defendant should be brought to trial under the provisions of the Speedy Trial Act.

5. Defendant has been advised of her right to a speedy trial and a signed Waiver of Speedy Trial is already on file with the Court.

6. The undersigned counsel has conferred with Assistant United States Attorney Brian P. Casey and Abram McGull II, and they have indicated that they have no objection to the granting of this requested continuance.

WHEREFORE, the Defendant respectfully requests this Court, pursuant to 18 U.S.C. § 3161(h)(8)(A) and (B), to remove this case from its scheduled trial setting of December 4, 2017, and to continue this case until the March 26, 2018, Joint Criminal Trial Docket.

Respectfully submitted,

/s/ Ian A. Lewis

**IAN A. LEWIS, #52819**

Assistant Federal Public Defender

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Attorney for Defendant

October 31, 2017

**CERTIFICATE OF SERVICE**

I hereby certify that on this 31<sup>st</sup> day of October, 2017, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which sent e-mail notification of such filing to all CM/ECF participants in this case.

/s/ Ian A. Lewis

**IAN A. LEWIS**